

Granted.

10:17 AM, Oct 6, 2022

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

CALVARY INDUSTRIES, LLC,

Plaintiff,

vs.

TAV HOLDINGS, INC.,

Defendant.

:
:
:
:
:
:
:
:
:
:
:

Case No. 1:22-cv-340

Judge Matthew W. McFarland

Magistrate Judge Karen Litkovitz

**JOINT MOTION TO STAY
DISCOVERY**



Plaintiff Calvary Industries, LLC (“Calvary”) and Defendant TAV Holdings, Inc. (“TAV”) (collectively, “The Parties”) jointly move to Stay Discovery pending the ruling on Defendant TAV Holdings, Inc.’s Rule 12(b)(2) Motion to Dismiss for Lack of Personal Jurisdiction (“Motion”). Plaintiff filed their response to TAV’s Motion on September 12, 2022 and Defendant’s deadline to file a Reply is October 10, 2022. Thus, in the interest of preserving judicial resources, the Parties respectfully request that the pending discovery deadlines be held in abeyance until a ruling on the Motion is issued.

Respectfully submitted,

/s/ Alexandra M. Berry
Alexandra M. Berry (0098176)
GRAYDON HEAD & RITCHEY LLP
312 Walnut Street, Suite 1800
Cincinnati, OH 45202-3157
Phone: (513) 629-2844
Fax: (513) 651-3836
Email: aberry@graydon.law

*Attorney for Defendant
TAV Holdings, Inc*

Agreed to by:

/s/ Thomas E. Grossman (w/ authorization)
Thomas E. Grossmann (0017965)
4533 Morris Court
Mason, OH 45040
Telephone: (513) 257-6789
Email: teg@tomgrossmann.com

*Attorney for Plaintiff,
Calvary Industries LLC*

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served upon the following via electronic mail (email) pursuant to Civ. R. 5(B)(2)(f), this 6th day of October 2022:

Thomas E. Grossmann
4533 Morris Court
Mason, OH 45040
teg@tomgrossmann.com

*Attorney for Plaintiff,
Calvary Industries LLC*

/s/ Alexandra M. Berry
Alexandra M. Berry (0098176)

12275850.1